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Attorneys For Plaintiff
THE BURLINGTON INSURANCE COMPANY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

THE BURLINGTON INSURANCE
COMPANY

Plaintiff,

v.

NAUTILUS INSURANCE COMPANY;
MONTICELLO INSURANCE COMPANY;
LINCOLN GENERAL INSURANCE
COMPANY; AND DOES 1 THROUGH 100,

Defendant(s).

Case No.: 3:05-cv-05336-SC

**STIPULATION FOR FILING OF
AMENDED COMPLAINT**

Date: August 4, 2006
Time: 10:00
Judge: Hon. Samuel Conti
Dept.: 1

Plaintiff THE BURLINGTON INSURANCE COMPANY (“Burlington”) and defendants
LINCOLN GENERAL INSURANCE COMPANY (“Lincoln General”) and NAUTILUS
INSURANCE COMPANY (“Nautilus”), through their respective counsel, HEREBY
STIPULATE AS FOLLOWS:

1. This action arises from a pending California state court case, entitled *Trammell, et al. v. Amin, et al.* (San Francisco Superior Court Case No. 04 428084) (hereinafter referred to as “Underlying Action”), in which a class of present and former tenants sued the owners of the Baldwin House Hotel located in San Francisco.

2. The instant matter arises from commercial general liability insurance coverage disputes among the insurers and their insureds as to responsibility for and allocation of certain

costs for the defense of the Underlying Action as well as indemnity that may be paid to settle that action.

3. Northfield Insurance Company ("Northfield") and Penn American Insurance Company ("Penn American") issued commercial general liability insurance policies to the insured defendants in the Underlying Action. The parties were not made aware of these policies issued by Northfield until after the commencement of this action.

4. Coverage issues currently exist by and among Burlington, Lincoln General, Northfield, Penn American, and the defendants in the underlying action – Chandrakant Amin, Manharbhai Amin, Tara Amin, and Laxmiben Amin.

5. Therefore, the parties request that this Court permit Burlington to file the Amended Complaint attached hereto as Exhibit A.

IT IS SO STIPULATED.

DATED: June 30, 2006

LHB PACIFIC LAW PARTNERS, LLP


DAVID B. DEMO
Attorney for Plaintiff
THE BURLINGTON INSURANCE COMPANY

DATED: June __, 2006

BURNHAM & BROWN

CLARK J. BURNHAM
Attorney for Defendant
LINCOLN GENERAL INSURANCE COMPANY

DATED: June __, 2006

BOLENDER & ASSOCIATES

JEFFREY S. BOLENDER
Attorneys for Defendant
NAUTILUS INSURANCE COMPANY

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1 costs for the defense of the Underlying Action as well as indemnity that may be paid to settle that
2 action.

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4 Company ("Penn American") issued commercial general liability insurance policies to the
5 insured defendants in the Underlying Action. The parties were not made aware of these policies
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9 Manharbhai Amin, Tara Amin, and Laxmiben Amin.

10 5. Therefore, the parties request that this Court permit Burlington to file the
11 Amended Complaint attached hereto as Exhibit A.

12 IT IS SO STIPULATED.

13 DATED: June __, 2006

LHB PACIFIC LAW PARTNERS, LLP

16 DAVID B. DEMO
17 Attorney for Plaintiff
THE BURLINGTON INSURANCE COMPANY

18 DATED: June 29, 2006

BURNHAM & BROWN



21 CLARK J. BURNHAM
22 Attorney for Defendant
LINCOLN GENERAL INSURANCE COMPANY

23 DATED: June __, 2006

BOLENDER & ASSOCIATES

26 JEFFREY S. BOLENDER
27 Attorneys for Defendant
NAUTILUS INSURANCE COMPANY

28

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9 Manharbhai Amin, Tara Amin, and Laxmiben Amin.

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11 Amended Complaint attached hereto as Exhibit A.

12 IT IS SO STIPULATED.

13 DATED: June __, 2006

LHB PACIFIC LAW PARTNERS, LLP

16 DAVID B. DEMO
17 Attorney for Plaintiff
18 THE BURLINGTON INSURANCE COMPANY

19 DATED: June __, 2006

BURNHAM & BROWN

21 CLARK J. BURNHAM
22 Attorney for Defendant
23 LINCOLN GENERAL INSURANCE COMPANY

24 DATED: June 29, 2006

BOLENDER & ASSOCIATES



26 JEFFREY S. BOLENDER
27 Attorneys for Defendant
28 NAUTILUS INSURANCE COMPANY